

EXHIBIT "B"



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February 24, 2023

Via Email: pacallahan@burnswwhite.com;

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BURNS WHITE LLC

1001 Conshohocken State Road, Suite

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Re: Webb vs. Platinum Health at Westgate, LLC d/b/a Westgate Hills Rehabilitation and Nursing Center, Vintage Healthcare, PHWH Holdings and Prestige Healthcare et al.

United States District Court for the Eastern District of Pennsylvania

Civil Case No. 22-2939-KSM

Dear Counsel,

A review of my file indicates that I have not yet received Defendants' responses to Plaintiff's Interrogatories (Set I), and Requests for Production of Documents (Set I and II) forwarded in the above matter on January 4, 2023.

Please provide Defendants' verified responses to same within ten (10) days of the date of this letter so that we may avoid motion practice on this issue.

Thank you for your attention to the above.

Sincerely,

MURRAY, STONE & WILSON, PLLC

/s/ Matthew T. Stone

Matthew T. Stone, Esquire

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MTS/jh

cc: Jonathan D. Levitan, Esquire (via email: Jonathan@jdlevitanlaw.com)